BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268–0001

PERIODIC REPORTING
(PROPOSAL THREE)

Docket No. RM2016-11

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO QUESTIONS 1-8, 11-13, 15, 18.a-c, AND 21 OF
CHAIRMAN'S INFORMATION REQUEST NO. 1**
(September 16, 2016)

The United States Postal Service hereby provides its responses to the above-

listed Questions Chairman's Information Request No. 1, issued September 9, 2016.

The questions are stated verbatim and followed by the response. Preparation continues

on responses to Questions 9-10, 14, 16-17, 18.d, and 19-20

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

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September 16, 2016

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1.   Please refer to Library Reference USPS–RM2016–11/1, "IOCSClusterfolder_Public" folder, "I_FORMS-FY16Q2Q3-Cluster.xlsm" and "CS06&7-FY16Q2Q3-Cluster.xlsx" files, and Library Reference USPS–RM2016–11/NP1, "IOCSClusterfolder_NonPublic" folder, "I_FORMS-NP-FY16Q2Q3-Cluster.xlsm" and "CS06&7-NP-FY16Q2Q3-Cluster.xlsx" files.[1]

   a.   Please confirm that these workbooks assume implementation of Proposal Nine.[2] If confirmed, please provide the "I_FORMS-FY16Q2Q3-Cluster.xlsm" and "CS06&7-FY16Q2Q3-Cluster.xlsx" workbooks filed in Library Reference USPS–RM2016–11/1 and the "I_FORMS-NP-FY16Q2Q3-Cluster.xlsm" and "CS06&7-NP-FY16Q2Q3-Cluster.xlsx" workbooks filed in Library Reference USPS–RM2016–11/NP1, assuming Proposal Nine has not been implemented.

   b.   If the Postal Service is unable to provide the requested information:

   i.   Please explain why the information cannot be provided.

   ii.   Please provide the public and non-public workbooks showing which costs and structural workbook changes were made as a result of Proposal Nine and which were made as a result of Proposal Three.

   c.   Please provide the referenced workbooks with results using the current methodology for the same time period as the Proposal Three data (Fiscal Year (FY) 2016, Quarters 2 and 3). If unavailable, please explain.

RESPONSE:

a,b)   Confirmed. It is not possible to implement IOCS-Cluster without acceptance of

Proposal Nine. IOCS-Cluster depends on TACS to provide control totals on costs

for each time bin; see the Estimation section in Proposal Three, pp. 22-25. In the

estimation formulas, H and HTOT are TACS workhours for carriers while in-

office, and those are necessary for developing the weights to apply to each

IOCS-Cluster reading. The office/street split, the primary subject of Proposal

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[1] Library Reference USPS–RM2016–11/1 – Public Material Relating to Proposal Three, August 22, 2016; Notice of Filing USPS–RM2016–11/1, USPS–RM2016–11/NP1, and Application for Nonpublic Treatment, August 22, 2016.

[2] *See also* the "Changes" tab in the referenced workbooks which list changes related to Docket No. RM2015-2, Proposal Nine (Proposal Nine).

Nine, could not be obtained from IOCS-Cluster without the use of TACS and the

methodology changes proposed in Proposal Nine.

Furthermore, IOCS-Cluster data collectors only perform readings on

carriers while they are in the facility. The do not spend their on-site time

recording detailed information when the carrier is on the street, including in the

parking lot or loading dock after clocking to the street. Rather, the system is

designed to maximize their time obtaining information about carriers who are

working in the office. This was one of the key methodology changes of Proposal

Nine.

Other changes in Proposal Nine, such as using DOIS data for cost

segments 12 and 13, were required because the office/street split would no

longer be determined by IOCS sampling. The requested workbooks are provided

in folders USPS-RM2016-11/2 and USPS-RM2016-11/NP2, subdirectory

ChIR1Q01.

c)   The requested files are provided in folders USPS-RM2016-11/2 and USPS-

RM2016-11/NP2, subdirectory ChIR1Q01. Note that, similar to the IOCS-Cluster

files, these also use data from FY15 for all other non-IOCS data elements, such

as the CCCS distribution keys for SPR and for collections.

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2.   The Postal Service states that "[In-Office Cost System (IOCS)]-Cluster data collection procedures take advantage of one of the elements of Proposal Nine ([Docket No.] RM2015-2) in which data on carriers' street time is obtained from [the Time and Attendance Collection System (TACS)] census system rather than estimated by IOCS." Petition, Proposal Three at 7.

      a.   Please confirm that Proposal Three does not depend on the prior approval of Proposal Nine.

      b.   If not confirmed, please explain the relationship between Proposal Three and Proposal Nine.

RESPONSE:

a,b)   Not confirmed. Please see the response to Question 1 of this Information

Request.

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3.   Please refer to Library Reference USPS-RM2016-11/1, folder
        "IOCSClusterFolder_Public," "ImpactTablesForIOCSCluster_Public" worksheet.
        For all hardcoded numbers in Tables 1 through 4 (in tabs 1-4), please provide
        direct links or references to the input data files.

   RESPONSE:

   Please see ChIR.1.Q.3.ImpactTablesForIOCSCluster.Public.xlsx in

   USPS-RM2016-11/2, and ChIR.1.Q.3.Table4Support.xlsx, filed under seal in

   USPS-RM2016-11/NP2.

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4.   Please provide the IOCS data collector instructions and Postal Service's
        Statistical Programs' policy memoranda for the data coding, data collection, and
        sampling methodology for the IOCS-Cluster design. *See* Petition, Proposal
        Three at 5-7, 9-10.

RESPONSE:

The instructions and memoranda are provided in USPS-RM2016-11/2, in subdirectory

ChIR1Q04.

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5. Please provide a current version of Handbook F-45, Data Collection User's Guide for In-Office Cost System and any subsequent updates not reflected in the current version of Handbook F-45 used under the current IOCS methodology.

RESPONSE:

Updates to Handbook F-45, Data Collection User's Guide for In-Office Cost System,

consisting of Statistical Program (SP) Letters, are provided in USPS-RM2016-11/2, in

subdirectory ChIRQ05.

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6.   Please refer to Docket No. ACR2015, Library Reference USPS–FY15–37, December 29, 2015, "USPS-FY15-37" folder, "MASTER.CODES.FY15" file. The Postal Service stated that this file contained "Activity Codes Used for Processing Fiscal Year 2014." Docket No. ACR2015, Library Reference USPS–FY15–37, December 29, 2015, "MASTER.CODES.FY15" file.

      a.   Please provide a "MASTER.CODES" file that contains the activity codes used to process FY 2015 data.

      b.   Please indicate which FY 2015 activity codes differ from those activity codes used to process the Proposal Three data.

RESPONSE:

a)   The "Master.CODES.FY15" file provided in the "USPS-FY15-37" folder is the file that contains the activity codes used to process the FY2015 data. The title "Activity Codes Used for Processing Fiscal Year 2014" was inadvertently not updated, and should have read "Activity Codes Used for Processing Fiscal Year 2015".

b)   The activity codes for Proposal Three are the same as the codes listed in MASTER.CODES.FY15 file, with the exception of the "6720" code specified in the CS06&7-NP-FY16Q2Q3-Cluster.xlsx workbook "Changes" sheet.

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7. Please refer to the Computerized On-Site Data Entry System (CODES)[3] software flowchart depiction in Docket No. ACR2015, Library Reference USPS–FY15–37, "IOCSDataEntryFlowchartFY15.xlsx." Please provide a similar flow chart depiction for Proposal Three IOCS data collection or CODES software.

RESPONSE:

The file "ChIR.1.Q.7.IOCSFlowchart_FY16.xlsx" is provided in folder USPS-RM2016-

11/2. This is the IOCS and IOCS-Cluster flowchart for FY2016 rather than for FY2015.

The differences due to IOCS-Cluster are:

Sheet Q16, decision diamond N16C4 (cell BC37), and alternative paths related to

recording of data about lunch while on street.

Sheet Q16, decision diamond N16E1 (cell CH26), and alternative paths related to

manual recording of route transportation type.

Sheet "Start (Header Screen)": decision diamond NS1, cell G39 and the following

differences in program flow. Note that the Header screens themselves are very different

between the two systems, differences that are not fully captured by the flowchart.

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[3] CODES is the IOCS data collection software used by IOCS data collectors that automatically and electronically executes the appropriate question and instruction sequence given the information entered. *See* USPS Handbook F-45, Data Collection User's Guide for In-Office Cost System, July 21, 2009, at iii, *http://www.prc.gov/docs/63/63811/F45_Handbook.pdf*.

8.   The Postal Service proposes two alternative methods related to afternoon carrier in-office time. Petition, Proposal Three at 3. "The recommended alternative is to treat all afternoon carrier in-office time from TACS as Support time, and therefore conduct no readings in the afternoon" whereas, for "the less preferred alternative, afternoon readings are clustered together into one-hour intervals and are all conducted by telephone." *Id.*

    a.   Please provide the rationale for each alternative and include supporting workpapers.

    b.   Please explain why the recommended alternative is better than the less-preferred alternative.

    c.   Please identify the workbook tabs and cell locations showing where and how the Postal Service incorporated either proposed alternative methodology in the workbooks provided in Library Reference USPS–RM2016–11/1 and Library Reference USPS–RM2016–11/NP1.

    d.   Please confirm that these proposed alternative methodologies apply only to the letter route group and not the Special Purpose Routes (SPR) group. If not confirmed, please explain.

RESPONSE:

a)   The rationale for the preferred alternative is two-fold. Firstly, most of the carriers' activities while in-office in the afternoon do not involve handling mail. Instead, they represent time returning from their route and other routine tasks. The current environment for carriers is different than when IOCS was originally designed. In the past, carriers would sometimes case mail, particularly non-pref mail, after returning from their routes in the afternoon. Those are no longer standard procedures, and carriers no longer case mail in the afternoon.

    Table 1 below lists data collection statistics by test type, in particular the total number of tests conducted, the number of active readings where a carrier was working in-office, and the number of readings where the carrier was handling mail. This table is also available in USPS-RM2016-11/2 in workbook

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"ChIR.1.Q.08.IOCSClusterDataCollection.xlsx." While carriers are handling mailpieces over 60 percent of the time during the morning, they only handle mailpieces about 6 percent of the time in the afternoon. It would not be reasonable to assign all of the afternoon time to those few mailpieces that are handled occasionally.

Secondly, it has proven to be very inefficient to attempt readings on carriers in the afternoon.. An approximate number of data collector hours needed to obtain a mail-handling reading is calculated in the final column of Table 1. For on-site readings, it takes roughly 15 or 20 minutes of time to get one mailpiece reading, while for afternoon telephone tests, it takes at least 25 hours, which is thus about 100 times less efficient.

Table 1: IOCS-Cluster Data Collection

TESTTYPE	Num Tests Conducted	Num Active Readings	Num Handling Mail	Active Readings / Test	% of active readings handling mail	Num Mailpieces / Test	# of DCT hours per mailpiece
AM Large zone	1,830	56,168	35,100	31	62%	19.18	0.26
AM Small zone	455	3,804	2,393	8	63%	5.26	0.38
PM Telephone	556	389	22	0.7	6%	0.04	25.27

The rationale for the less preferred alternative is to ensure some non-zero probability of sampling every moment of carriers time while in-office. If carriers did spend significant time handling mail in the afternoon and the mix of mail was significantly different from the morning, it would be important to have some method to obtain that information.

b)   The preferred alternative is favored because it avoids unnecessary data collection expenses. Because carriers do not handle mail often in the afternoon, it is not necessary to mount an expensive and very inefficient data collection effort in order to continue to verify that fact.

c)   The alternative methodology must be implemented by changes to the estimation program CL101. There would be no changes to the structures in workbooks provided in USPS-RM2016-11/1 or USPS-RM2016-11/NP1, only changes in the inputs.

d)   The alternative methodology would apply to Special Purpose Routes should the Commission determine that SPR carriers working in-office should continue to be sampled rather than modeled.

11. The Postal Service states that "Table 4…compares the costs for cost segments 6 and 7 and for total CRA costs, for FY 2016 Q2 and Q3." *Id.* at 16.

    a. Please confirm that columns "FY2015 Total Attributable" and "Revised FY2015 Total Attributable" provide attributable costs for FY 2015 (as indicated in column headings) and not attributable costs for FY 2016 Quarters 2 and 3 (as stated in the above-referenced quote).

    b. If confirmed, please provide the total attributable costs and revised attributable costs for FY 2016 Quarters 2 and 3.

    c. If not confirmed, please clarify what data are provided in columns "FY2015 Total Attributable" and "Revised FY2015 Total Attributable."

    d. Please indicate if the implementation of IOCS-Cluster design would affect costs for CRA cost segments other than cost segments 6 and 7. If applicable, please provide the effect of the IOCS-Cluster design implementation on each of those cost segments.

RESPONSE:

a), c) Please see the Table 4 tab in the ChIR.1.Q.3 Excel file provided as part of

USPS-RM2016-12/2. The first six data columns (B through G) replicate the data

columns as they appeared in Table 4 as provided in the Proposal. As suggested

in the question, column E ("FY2015 Total Attributable") contains the FY2015 total

attributable cost by product. But column F (Revised FY2015 Total Attributable")

is something of a hybrid – it essentially indicates what column E (the FY15

attributable costs) would have looked like if the actual FY2015 costs specific to

Cost Segments 6 & 7 (included in column E as a component of total attributable

costs) had been replaced with adjusted Cost Segments 6 & 7 amounts,

increased or decreased by the percentage amount shown in column D. That

percentage amount, in turn, is based on the Cost Segment 6 & 7 values for

Quarters 2 and 3 of FY2016, shown in columns B and C. (Derivation of the

Column F amount is actually slightly more complicated than this description, because not only have the FY2015 values for Cost Segments 6 & 7 been adjusted by the Column D percentage amounts, but, as shown in the new Excel file in USPS-RM2016-12/2, a piggyback factor has been included in the adjustment as well.)

Columns E, F, and G (the last three columns of Table 4) were simply intended to put the expected change from the proposal in Costs Segments 6 & 7 (appearing in columns B, C, and D) in context, by approximating what effect changes of those magnitudes in Cost Segments 6 and 7 in FY 2015 would have caused in *total* attributable costs (i.e., across all cost segments). It is necessary to employ FY2015 total attributable costs to gain this context, because there are no overall CRA costs available for Quarters 2 and 3 of FY 2016 (i.e., across all cost segments). The language from the Petition quoted in the question took perhaps too much of a shortcut in explaining how Table 4 illustrates the impact of the proposal two ways. The first way (Columns B-D) presents the expected direct impact on Cost Segments 6 & 7 costs specifically, and the second way (Columns E-G) more broadly approximates the impact on total attributable costs. Derivation of both types of anticipated impacts, however, is rooted in data gathered in Quarters 2 and 3 of FY2016.

b)   The total attributable costs for FY2016 Q2 and Q3 are not available at this time. CRA costs for FY2016 across all cost segments will not be available until the FY2016 ACR is finalized.

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d)   Implementation of IOCS-Cluster would affect numerous CRA cost segments in addition to cost segments 6 and 7. However, piggyback factors were already used to address this in the calculation of the impact on FY2015 CRA costs provided previously in Table 4 in the Petition and in USPS-RM2016-11/1 and USPS-RM2016-11/NP1. The effects as estimated with the application of the piggyback factors can be seen more clearly now in the Table 4 tab of the ChIR.1.Q3 Excel file provided in USPS-RM2016-12/2.

There are additional impacts to cost segment 2 (Supervisors) due to the IOCS-Cluster sampling of carriers acting as supervisors, and due to the use of TACS to integrate this with non-cluster sampling of full-time supervisors. The magnitude of this impact is small compared to the overall changes due to IOCS-Cluster. Similarly, there may be an impact on carriers acting as clerks; however this is infrequent and the magnitude of this impact would be very small.

12.   The Postal Service states that "[s]ince the IOCS-Cluster design does not use [a cost ascertainment group (CAG)], the proposed methodology distributes mixed mail within route group and basic function only." *Id.* at 12. Please explain why the Postal Service chose to distribute mixed mail within route group and basic function only, instead of distributing mixed mail by zone, and provide the supporting workpapers.

RESPONSE:

The Postal Service has not yet investigated the suggested approach of distributing

mixed mail by zone. This approach may be feasible, but requires evaluation of whether

there are sufficient data for all zones and basic functions, and possibly assessment of a

methodology for the combinations of zones and basic functions with insufficient data.

13.   The Postal Service states that "the current design of IOCS-Cluster does not include testing on Sundays since carriers do not work regular letter routes on Sundays." *Id.* at 11. Further, it asserts that "[t]he number of in-office hours for letter routes on Sundays is too small to justify on-site sampling on Sundays." *Id.*

    a.   Please discuss the benefits of sampling in-office hours for letter routes on Sundays.

    b.   Please identify the minimum number of in-office hours for letter routes on Sundays that would justify on-site sampling on Sundays.

    c.   Please confirm that in-office work and the types of products delivered on Sundays differ from in-office work and deliveries on other days. If confirmed:

        i.   Please discuss how the effects of these differences were taken into consideration when deciding against sampling in-office costs for Sunday letter routes.

        ii.   Please explain how the Postal Service plans to adjust or account for no sampling on Sundays and, if available, provide supporting workpapers.

    d.   Please explain whether the Postal Service considered telephone sampling as a method to collect Sunday in-office costs data. If not considered, please explain why not. Please discuss whether telephone sampling would be a suitable method to collect Sunday in-office costs data.

RESPONSE:

a)   The benefit would be that there would be a non-zero probability of sampling

every moment of letter-route carriers time while in-office.

b)   In order to justify data collection on-site with a data collector, there should be at

least 6 carriers at the facility who spend at least one hour working inside the

facility.

c)   Confirmed. Letter-route carriers have very few Sunday hours, and these are

primarily during peak season. Since they do not do letter casing on Sundays,

their activities and the products they handle on Sunday do differ from other days.

However, in FY2016 Q3YTD, out of 54,763,375 in-office LDC 21 workhours, only

8787,854 were on Sundays, just 0.16 percent. Even if these hours were sampled

and mailpiece data obtained, the impact on costs would be *de minimus*.   See

workbook ChIR.1.Q.13Table.TACSHrsByDOW.xlsx in USPS-RM2016-11/2.

d)   Because there are so few hours for letter carriers working in-office on Sunday,

and because the impact of obtaining data for those hours would be *de minimus*,

the Postal Service does not have plans to sample on Sundays.

15.   The Postal Service states that "[t]he recommended alternative is to treat all in-office SPR time from TACS as support time for the street, and use the distribution keys from the City Carrier Cost System (CCCS)." *Id.* at 4. The Postal Service also proposes that Sunday city carrier hours, 95 percent of which are clocked to SPRs, be distributed per the SPR street distribution key. *Id.* at 11. In Docket No. ACR2015, Library Reference USPS–FY15–34, the Postal Service provided three CCCS files that could potentially be used as "the distribution keys."[4] One file contains the SPR street distribution key, another contains the CCCS street distribution keys, and another contains the "Collection" mail volumes.

   a.   Please specify which distribution key(s) the Postal Service plans to apply to Monday through Saturday workhours and costs and provide the rationale and supporting workpapers for the selected distribution key(s).

   b.   Please confirm that Sunday city carrier hours and costs would be distributed to products using the SPR street distribution key. If not confirmed, please explain.

   c.   Please specify which CCCS street distribution keys would be used for SPR in-office time accrued for LDC 27 (collections). Please provide the rationale and supporting workpapers for the selected distribution keys.

RESPONSE:

a)   The distribution key that would be applied to Monday through Saturday SPR

workhours can be obtained from the CS06&7 workbook by adding up columns P

and Q in sheet 7.0.6. This is the weighted average of products handled by SPR

carriers on the street. Since in-office activities are primarily in support of street

activities, this is an appropriate distribution key to use.

b.   Confirmed.

c.   In the extant proposal, SPR costs for LDC 27 (collection) would use the same

distribution key as described in part a). There is no intent here to change current

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[4] Docket No. ACR2015, Library Reference USPS–FY15–34, December 29, 2015, "FY15_SPR_CVs_Public_Final;" "CCCS_CVs_FY15_Public_Final;" and "CCCS_FY2015_Collection_Final_Public" files.

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CRA methodology that combines LDCs 23 and 27 together for the overall SPR costs. One reason they are combined is that there are routes that combine delivery and collection and are typically clocked to LDC 23.

For purposes of the CRA, SPR combines both parcel delivery and collection together. One reason they are combined is because many SPR carriers are on "mixed" routes that cover both activities, but are clocked to an LDC 23 MODS code. This IOCS-Cluster proposal does not propose to change the current methodology for costing SPR while on-street. TACS data could be used to separate costs into LDC 23 and 27, if desired. But the issue of "mixed" routes would need to be addressed.

18.   Please refer to the Preface for Library Reference USPS-RM2016-11/1.

a.   The description above Table 1 states that "Table 1 lists the activity codes that have their costs determined by TACS clock ring data rather than IOCS readings." Library Reference USPS–RM2016–11/1, Preface at 1. Please provide the programs used to develop these costs and all inputs necessary to run the programs.

b.   Please refer to "Table 2: IOCS-Cluster Variable Descriptions." Library Reference USPS–RM2016–11/1, Preface at 2-3. For the variable "AttCost," please provide the sources and supporting workpapers showing how the values are calculated.

c.   Table 3 states that the "Data" folder, "IOCSDataDictionary_IOCSCluster.xls" file lists all of the variables in the IOCS-Cluster data set. Library Reference USPS–RM2016–11/1, Preface at 4. However, none of the IOCS-Cluster data sets filed in Library Reference USPS-RM2016-11/1 and Library Reference USPS-RM2016-11/NP1 contain all of the variables in the IOCS data dictionary. Please file versions of the IOCS-Cluster data sets that include all of the variables listed in the "IOCSDataDictionary_IOCSCluster.xls" file.

d.   Table 3 lists the SAS programs in the "SASPrograms" folder used to develop the cost estimates filed with Proposal Three. Library Reference USPS–RM2016–11/1, Preface at 4. Please provide all inputs, including data sets and macro definitions, necessary to run each of the following SAS programs:

i.   "CL101"

ii.   "CL103"

iii.   "CARMMCL"

RESPONSE:

a,b)   The programs and input files are provided in USPS-RM2016-11/2, subdirectory

ChIR1Q18. These include the POEXP table (the projected accounting totals for

the quarter), and the summaries of TACS workhours for each of the pay periods.

These TACS workhours are summarized by day of week, BaseCraft, CraftGrp,

LDCGrp, RtGrp, MODStype. These TACS summaries are then inputs to program

ACOSTACS to assign control dollars by craft into subcategories based on
workhours. The program itself, ACOSTACS, can be found in the Program
subdirectory, and the output SAS dataset can be found in the Output
subdirectory. Parsing requirements can be found in the ACOSTACS program.

c)   See file tally16q2q3.sas7bdat in USPS-RM2016-11/NP2, subdirectory
ChIR1Q18. Data fields that contain personal identifiable information have been
redacted.

d)   A response to this portion of the question is still being prepared.

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21. Please provide FY 2015 and available FY 2016 versions of the IOCS SAS data set typically provided in Library Reference USPS–FY15–NP21.[6] Please include the following additional data variables: "Q05A" (Actual Reading Time), "F13" (office name, city and state), and an unedited version of "F234" (operation/route code). *See* Docket No. ACR2015, Library Reference USPS–FY15–37, "IOCSDataDictionary_FY15" file.

RESPONSE:

The requested SAS datasets are provided under seal in USPS-RM2016-11/NP2.

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[6] Docket No. ACR2015, Library Reference USPS–FY15–NP21, December 29, 2015.